Remarks

Referring to paragraph 1 of the detailed action, the Examiner will find herewith corrected drawings.

Regarding paragraphs 2 to 9 of the detailed action, the Examiner will see that Applicants have amended the claims by canceling claims 34 to 44. All other claims remain unamended.

The Examiner rejects claims 1 to 67 under 35 USC 103(a) as being unpatentable over Koeppel (US 6,477,575) in view of Lambert (US 6,038,601). Applicants respectfully traverse this rejection for the following reasons:-

The present invention is directed to personalization of content provided by a content providing server to a client equipment unit through the use of a data manipulation server <u>disposed in-line between the client equipment unit and the content providing server</u>.

The Examiner is undoubtedly aware that a content providing server will typically serve a very large number of users operating client equipment units and, vice versa, a user of a client equipment unit will typically access a very large number of content providing servers. By providing a data manipulation server disposed in-line between the client equipment unit and the content providing server, content may be personalized for a large number of users of client equipment units accessing a large number of content providing servers.

The Examiner will note that each of the independent claims (except for claim 34 now canceled) recites the feature of disposing a data manipulation server in-line between the client equipment unit and the content providing server or corresponding features. In claim 12, the corresponding feature recited is coupling the data manipulation server apparatus in-line between a client equipment unit and a content providing server and arranging for a data manipulation engine to intercept a communication between the client equipment unit and the content providing server. In claim 23, the content providing server apparatus is arranged to transmit web-related data comprising an attribute for replacement by a data manipulation server. In claim 45, web-related data comprising an attribute for replacement by a data manipulation server is claimed. In claim 55, the method of personalizing web content

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comprises the step of intercepting web-related data communicated between the user equipment unit and the content providing server and in claims 65 to 67 the corresponding feature is code to intercept web-related data communicated between the user equipment unit and the content providing server.

The Examiner argues that the Koeppel reference discloses the above features and cites module 110 of sheet 1, figure 1 and col 6, lines 43-47 of Koeppel. Applicants believe this to be in error. Module 110 and the corresponding passage of the description represent the web server of the system described in Koeppel. This is analogous to the content providing server of the present invention and not to the data manipulation server which is disposed in-line between the content providing server and the client equipment unit. The Examiner will see that Koeppel is consistent in describing that the web server determines the content to be served to the user (see for example col 5, lines 28-31 and 45-51). There is no disclosure in Koeppel whatsoever of a data manipulation server disposed in-line between the client equipment unit and the content providing server or of any of the corresponding features set out above.

Applicants further submit that there is no disclosure in Koeppel of a data manipulation server being adapted to modify web-related data ... using a predetermined amount of data relating to the user ... or corresponding features. The references in Koeppel cited by the Examiner (col 1, lines 7-10; col 2, lines 41-49; and sheet 4, figure 5) simply do not disclose using a predetermined amount of data.

For the above reasons, it is submitted that the Examiner's rejection is not substantiated. Furthermore, in paragraph 8 of the detailed action, the Examiner argues that the Koeppel reference discloses the use of dynamic data relating to the user and cites col 4, lines 7-12, lines 32-38 and lines 39-45. Applicants also believe this to be in error. The passage cited by the Examiner describes dynamic delivery of content. This is a conventional feature of all web servers and does not equate to the use of dynamic user data to personalize the content dynamically delivered by web servers.
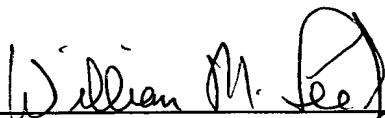
Furthermore, in paragraph 8 of the detailed action, the Examiner argues that the Koeppel reference discloses the dynamic data being obtained from an access provider associated

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with supporting communications between the client equipment unit and the content providing server and cites col 4, lines 7-12, lines 32-38 and lines 39-45). Applicants further believe this to be in error. There is no disclosure whatsoever in Koeppel of the dynamic data being obtained from an access provider – for example, from an Internet Service Provider or mobile network operator.

For the above reasons, Applicants respectfully traverse the Examiner's rejection and request favorable reconsideration of the application.

March 5, 2004   Respectfully submitted,

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